

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

C.A. No. 1:19-cv-12551-FDS

Hon. F. Dennis Saylor IV

**DEFENDANT GOOGLE LLC’S  
UNOPPOSED MOTION TO IMPOUND/SEAL DESIGNATED MATERIAL**

Pursuant to Local Rule 7.2 and the Protective Order in this case (“Protective Order”), (Dkt. No. 87), Defendant Google LLC (“Google”) respectfully requests that this Court impound (seal) an un-redacted version of Defendant Google LLC’s Trial Brief filed today.

The Protective Order allows a party producing documents in discovery to designate documents as “Confidential” after making a good-faith determination that the documents contain information that is “confidential, proprietary, and/or commercially sensitive information,” and to designate documents as “Highly Confidential – Attorneys’ Eyes Only” after making a good-faith determination that the documents contain information that is extremely confidential and/or sensitive in nature and the disclosure of such documents is likely to cause economic harm or significant competitive disadvantage. Protective Order ¶¶ 6-7. That Order requires that a party intending to make court filings referring to such Protected Material bring a motion to impound. *Id.* ¶ 14.

Google’s above-identified Trial Brief contains confidential information that Singular has designated as Highly Confidential – Attorneys’ Eyes Only under the Protective Order. Submission of an un-redacted version of Google’s Trial Brief is necessary to permit the Court to fully evaluate

the issues raised in Google's Trial Brief. Google therefore brings this Motion to Impound to seal an un-redacted copy of Google's Trial Brief. Additionally, Google has publicly filed a redacted version of its Trial Brief, which redacts the confidential information discussed above.

For the foregoing reasons, Google respectfully requests that the Court permit it to file the above-identified Trial Brief under seal. Google further requests that the document remain impounded until further order by the Court, and that upon expiration of the impoundment that the documents be returned to Google's counsel.

Respectfully submitted,

Dated: December 29, 2023

By: /s/ Nathan R. Speed  
Gregory F. Corbett (BBO #646394)  
gcorbett@wolfgreenfield.com  
Nathan R. Speed (BBO #670249)  
nspeed@wolfgreenfield.com  
Elizabeth A. DiMarco (BBO #681921)  
edimarco@wolfgreenfield.com  
Anant K. Saraswat (BBO #676048)  
asaraswat@wolfgreenfield.com  
WOLF, GREENFIELD & SACKS, P.C.  
600 Atlantic Avenue  
Boston, MA 02210  
Telephone: (617) 646-8000  
Fax: (617) 646-8646

Robert Van Nest (admitted *pro hac vice*)  
rvannest@keker.com  
Michelle Ybarra (admitted *pro hac vice*)  
mybarra@keker.com  
Andrew Bruns (admitted *pro hac vice*)  
abruns@keker.com  
Vishesh Narayen (admitted *pro hac vice*)  
vnarayen@keker.com  
Christopher S. Sun (admitted *pro hac vice*)  
csun@keker.com  
Anna Porto (admitted *pro hac vice*)  
aporto@keker.com  
Deeva Shah (admitted *pro hac vice*)  
dshah@keker.com  
Stephanie J. Goldberg (admitted *pro hac vice*)  
sgoldberg@keker.com  
Eugene M. Paige (admitted *pro hac vice*)

epaige@keker.com  
Rachael E. Meny (admitted *pro hac vice*)  
rmeny@keker.com  
Eric K. Phung (admitted *pro hac vice*)  
ephung@keker.com  
Kaiyi A. Xie (admitted *pro hac vice*)  
kxie@keker.com  
Spencer McManus (admitted *pro hac vice*)  
smcmanus@keker.com  
KEKER, VAN NEST & PETERS LLP  
633 Battery Street  
San Francisco, CA 94111-1809  
Telephone: (415) 391-5400

Michael S. Kwun (admitted *pro hac vice*)  
mkwun@kblfirm.com  
Asim M. Bhansali (admitted *pro hac vice*)  
abhansali@kblfirm.com  
KWUN BHANSALI LAZARUS LLP  
555 Montgomery Street, Suite 750  
San Francisco, CA 94111  
Telephone: (415) 630-2350

Matthias A. Kamber (admitted *pro hac vice*)  
matthiaskamber@paulhastings.com  
PAUL HASTINGS LLP  
101 California Street, 48<sup>th</sup> Floor  
San Francisco, CA 94111  
Telephone: (415) 856-7000  
Fax: (415) 856-7100

Ginger D. Anders (admitted *pro hac vice*)  
Ginger.Anders@mto.com  
J. Kain Day (admitted *pro hac vice*)  
Kain.Day@mto.com  
MUNGER, TOLLES & OLSON LLP  
601 Massachusetts Avenue NW, Suite 500E  
Washington, D.C. 20001  
Tel: (202) 220-1100

Jordan D. Segall (admitted *pro hac vice*)  
Jordan.Segall@mto.com  
MUNGER, TOLLES & OLSON LLP  
350 South Grand Avenue, 50th Floor  
Los Angeles, CA 90071-3426  
Tel: (213) 683-9100

*Counsel for Defendant Google LLC*

**LOCAL RULE 7.1(a)(2) CERTIFICATION**

Pursuant to Local Rule 7.1(a)(2), I certify that, on December 28, 2023, counsel for Defendant Google LLC and counsel for Plaintiff Singular Computing LLC met and conferred in good faith regarding resolution of this motion. Counsel for Plaintiff stated that it does not oppose the relief requested in this motion.

/s/ Nathan R. Speed  
Nathan R. Speed

**CERTIFICATE OF SERVICE**

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

/s/ Nathan R. Speed

Nathan R. Speed